

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 5, 2023

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Ulyanova, et al. v. Garland, et al.*, No. 23 Civ. 4089 (RA)

Dear Judge Abrams:

This Office represents defendants (the “government”) in the above-referenced action in which the plaintiffs seek an order compelling the United States Citizenship and Immigration Services (“USCIS”) to adjudicate plaintiff’s Petition for Alien Relative (Form I-130) and the Application to Register or Adjust Status (Form I-485). I write respectfully, and jointly with the plaintiffs, to request a 90-day stay of this matter, from July 24, 2023, to October 24, 2023. I also respectfully request that the initial pretrial conference currently scheduled for July 12, 2023, Dkt. No. 23, and the joint letter and proposed case management plan due in advance of that conference, be adjourned *sine die*.

On June 15, 2023, USCIS approved plaintiff’s I-130 petition, and USCIS is prepared to begin adjudicating the I-485 application. The parties may be able to resolve this matter without further intervention of the Court. Accordingly, the requested stay is in the interests of efficiency and conservation of judicial and party resources. *See Landis v. North Am. Co.*, 299 U.S. 248, 254-55 (1936) (a district court has the “inherent power” to stay a pending action in the interest of judicial economy).

This is the parties’ first request for a stay. The parties further propose providing a joint status update or stipulation and proposed order of dismissal by October 24, 2023. I thank the Court for its consideration of this letter.

Respectfully submitted,

Application granted.

SO ORDERED.

Hon. Ronnie Abrams
7/6/2023

By: s/ Nancy Pham
NANCY D. PHAM
Special Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, New York 10007
Telephone: (202) 305-8062
E-mail: nancy.pham3@usdoj.gov
Attorney for Defendants

cc: Counsel of record (via ECF)